

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)**

Anthony Campbell, )  
                    )  
Plaintiff,       )  
vs.                )  
                    )  
Isolation Technologies, Inc. )  
Larry D'Amato     )  
Defendants       )

Case No. 04-40236 FDS

**PROPOSED STATEMENT AND PRE-TRIAL SCHEDULE  
OF DEFENDANT, ISOLATION TECHNOLOGIES, Inc.**

**1. STATEMENT OF CLAIMS AND DEFENSES**

- A. Plaintiff: Plaintiff alleges that Defendant failed to offer employment due to his race.
- B. Defendant: Defendant denies the claims and asserts that an offer of employment with the Defendant was made, however, and rejected by the Plaintiff.

**2. DISCOVERY PLAN**

**(i) Fact Discovery**

- A. Initial Rule 26(a)(1) Disclosures: April 15, 2005
- B. Deadline to serve written discovery requests: May 6, 2005
- C. Completion of depositions: July 8, 2005

**(ii) Expert Discovery**

- A. Plaintiff's Designation of Experts: August 5, 2005
- B. Defendant's Designation of Rebuttal Experts: September 2, 2005
- C. Completion of Expert Depositions: September 30, 2005

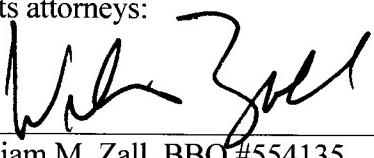
**3. SCHEDULE FOR FILING OF MOTIONS**

- A. Dispositive Motions to be filed by: October 28, 2005
- B. Responses to Dispositive Motions to be filed by: November 11, 2005
- C. Reply memos filed by: November 25, 2005

Respectfully submitted this 24<sup>th</sup> day of March, 2005.

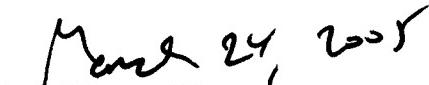
Isolation Technologies, Inc.

By its attorneys:



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Dated:



**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon each party appearing pro se by mail on March 24, 2005.

  
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William M. Zall